

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS DIVISION**

CATHERINE ALEXANDER,

Plaintiff,

-vs-

TAKE-TWO INTERACTIVE SOFTWARE, INC.,
2K GAMES, INC.; 2K SPORTS, INC.; WORLD
WRESTLING ENTERTAINMENT, INC.;
VISUAL CONCEPTS ENTERTAINMENT;
YUKE'S CO., LTD.; AND YUKE'S LA, INC.,

Defendants.

CASE NO. 3:18-CV-966-SMY

JOINT STIPULATION ON ADMISSIBILITY OF TRIAL EXHIBITS

Plaintiff Catherine Alexander ("Plaintiff"); and Defendants Take-Two Interactive Software, Inc., 2K Games, Inc., 2K Sports, Inc., Visual Concepts Entertainment, and World Wrestling Entertainment, Inc. (collectively, "Defendants"), by and through their attorneys, hereby jointly stipulate to the admissibility of the trial exhibits identified below. Accordingly, the parties respectfully move to admit the exhibits for use at trial and request that the Court issue an order to that effect. For any pre-admitted exhibits not used during trial, the parties will meet and confer concerning which such exhibits should be provided to the jury during its deliberations, and the parties reserve the right to object to the jury seeing exhibits that were not used during trial.

Plaintiff's Exhibits

Defendants do not object to the admissibility of the following exhibits offered by

Plaintiff:

Plt. Exh. No.	Description
1	Certificate of Registration from the U.S. Copyright Office –Dove [ALEXANDER000060-61]
2	Certificate of Registration from the U.S. Copyright Office – Rose [ALEXANDER000062]
3	Certificate of Registration from the U.S. Copyright Office – Skulls [ALEXANDER000063-64]
4	Certificate of Registration from the U.S. Copyright Office – Tribal Addition [ALEXANDER000065-66]
5	Certificate of Registration from the U.S. Copyright Office – Tribal Design [ALEXANDER000070-71]
6	Copyright registration application for Tribal Addition design [ALEXANDER000001-4, Alexander Depo Exh 3]
7	Copyright registration application for Dove design [ALEXANDER000009-14, Alexander Depo Exh 16]
8	Copyright registration application for Rose design [ALEXANDER000015-19, Alexander Depo Exh 17]
9	Copyright registration application for Skulls design [ALEXANDER000020-24, Alexander Depo Exh 18]
10	Copyright registration application for Tribal design [ALEXANDER000025-28, Alexander Depo Exh 7]
11	Photograph of Plaintiff and Mr. Orton [ALEXANDER000036]
12	Sketch of Plaintiff's dove tattoo design [ALEXANDER000037, Alexander Depo Exh 12]
13	Sketch of Plaintiff's tribal addition tattoo design [ALEXANDER000038, Alexander Depo Exh 5]
14	Sketch of Plaintiff's tribal addition tattoo design [ALEXANDER000039, Alexander Depo Exh 6]

Plt. Exh. No.	Description
15	Sketch of Plaintiff's tribal addition tattoo design [ALEXANDER000040, Alexander Depo Exh 4]
16	Sketch of Plaintiff's tribal design addition for Mr. Orton's tattoos arm(s) [ALEXANDER000041, Alexander Depo Exh 8]
17	Photograph of Mr. Orton with tattoos on arms [ALEXANDER000043, Alexander Depo Exh 11]
18	Photograph of Mr. Orton's arm tattoos [ALEXANDER000044, Alexander Depo Exh 10]
19	Photograph of Mr. Orton's upper arm tribal design and partial view of back tribal addition [ALEXANDER000045, Alexander Depo Exh 14]
20	Photograph of Mr. Orton's tattoos on arms [ALEXANDER000046]
21	Photograph of Mr. Orton's upper arm and upper back tribal tattoos [ALEXANDER000047]
22	Photograph of Mr. Orton's Rose arm tattoos [ALEXANDER000048, Alexander Depo Exh 13]
23	Photograph of Mr. Orton's skull arm tattoos [ALEXANDER000049]
24	George Lopez show, interview of Mr. Orton [ALEXANDER000050]
25	Article: The 20 Coolest Tattoos in WWE History [Zagal Depo Exh 3]
26	WWE 2K Franchise Sales Since Apr'2015 [TAKE-TWO_0000982, Snyder Depo Exh 9]
27	WWE 2K Franchise Sales Since Apr'2015 [TAKE-TWO_0000983, Snyder Depo Exh 10]
28	WWE 2K Franchise Sales Since Apr'2015 [TAKE-TWO_0001332, Snyder Depo Exh 11]
29	License between Take-Two Interactive Software, Inc. and World Wrestling Entertainment [TAKE-TWO_0000498-542, Little Depo Exh 2]
30	Amendment 1 to License between Take-Two Interactive Software, Inc. and World Wrestling Entertainment [TAKE-TWO_0000543-559, Little Depo Exh 3]

Plt. Exh. No.	Description
31	Master Developer Agreement between Yuke's Co., Ltd. and 2K Sports, Inc. [TAKE-TWO_0000560-609, Little Depo Exh 4] (Confidential)
32	Images of Mr. Orton [TAKE-TWO_0000798-822, Little Depo Exh 5]
33	Images of Mr. Orton [TAKE-TWO_0000909-929, Little Depo Exh 6]
34	Screenshot of WWE 2K16 video of Mr. Orton's tattoos [TAKE-TWO_0000481, Little Depo Exh 7]
35	IndianVideoGamer.com Interview: WWE 2K18 Executive Producer Mark Little [Little Depo Exh 8]
36	United States Securities and Exchange Commission – Form 10-K for Take-Two Interactive Software, Inc. for the fiscal year ended March 31, 2018 [Clark Depo Exh 4]
42	Physical copy of WWE 2K16, XBOX ONE format [Doc 142-24]
43	Packaging and insert of WWE 2K16 XBOX ONE format [Doc 142-24]
44	Physical copy of WWE 2K17, XBOX ONE format [Doc 142-25]
45	Packaging and insert of WWE 2K17 XBOX One format [Doc 142-25]
46	Physical copy of WWE 2K18, XBOX ONE format [Doc 142-26]
47	Packaging and insert of WWE 2K18 XBOX One format [Doc 142-26]
48	Physical copy of WWE 2K16, Sony PlayStation 4 format [TAKE-TWO_0000001]
49	Packaging and Insert of WWE 2K16 Sony PlayStation 4 format [TAKE-TWO_0000001]
50	Physical copy of WWE 2K17, Sony PlayStation 4 format [TAKE-TWO_0000002]
51	Packaging and Insert of WWE 2K17 Sony PlayStation 4 format [TAKE-TWO_0000002]
52	Physical copy of WWE 2K18, Sony PlayStation 4 format [TAKE-TWO_0000003]
53	Packaging and Insert of WWE 2K18 Sony Play Station 4 format [TAKE-TWO_0000003]

Plt. Exh. No.	Description
54	WWE Source Product Submission #3540 [Kiang Depo Exh 4; WWE_Alexander0000109]
55	WWE Source Product Submission #17984 [Kiang Depo Exh 5; WWE_Alexander0000207]
56	WWE Source Product Submission #4073 [Kiang Depo Exh 6; WWE_Alexander0000112]
59	Screenshot of WWE 2K17 video of Mr. Orton's tattoos [WWE_Alexander_0000166]
60	Video of Mr. Orton's videogame character [TAKE-TWO_0000823.M4V]
61	Video of Mr. Orton from WWE 2K Game [WWE_Alexander0000172.m4v]
62	Video of Mr. Orton from WWE 2K Game [WWE_Alexander0000180.m4v]
63	Trailer for WWE 2K17 containing Mr. Orton [WWE_Alexander0000200.mp4]
64	Trailer for WWE 2K16 containing Mr. Orton [TAKE-TWO_0000481.mp4]
80	Photographs of the rose tattoo on Randy Orton [ALEXANDER000018-19]
81	Photographs of the dove tattoo on Randy Orton [ALEXANDER000012-14]
82	Photographs of the skulls tattoo on Randy Orton [ALEXANDER000023-24]
83	Photographs of the tribal tattoo on Randy Orton [ALEXANDER000028]
84	Photographs of the tribal addition tattoo on Randy Orton [ALEXANDER000004]
104	WWE 2K16 video [TAKE-TWO_0000177.mp4]
105	WWE 2K16 video [TAKE-TWO_0000178.mp4]
106	WWE 2K17 video [TAKE-TWO_0000179.mp4]
107	WWE 2K17 video [TAKE-TWO_0000180.mp4]
108	WWE 2K18 video [TAKE-TWO_0000181.mp4]
109	WWE 2K18 video [TAKE-TWO_0000182.mp4]

Plt. Exh. No.	Description
110	WWE 2K17 video [TAKE-TWO_0000471.mp4]
111	WWE 2K18 video [TAKE-TWO_0000472.mp4]
112	WWE 2K18 video [TAKE-TWO_0000473.mp4]
113	WWE 2K16 video [TAKE-TWO_0000474.mp4]
114	WWE 2K18 video [TAKE-TWO_0000475.mp4]
115	WWE 2K17 video [TAKE-TWO_0000476.mp4]
116	WWE 2K17 video [TAKE-TWO_0000477.mp4]
117	WWE 2K16 video [TAKE-TWO_0000478.mp4]
118	WWE 2K16 video [TAKE-TWO_0000479.mp4]
119	WWE 2K17 video [TAKE-TWO_0000480.mp4]
120	WWE 2K17 video [TAKE-TWO_0000482.mp4]
121	WWE 2K16 video [TAKE-TWO_0000483.mp4]
122	WWE 2K17 video [TAKE-TWO_0000484.mp4]
123	WWE 2K18 video [TAKE-TWO_0000485.mp4]
124	WWE 2K17 video [TAKE-TWO_0000486.mp4]
125	WWE 2K17 video [TAKE-TWO_0000487.mp4]
126	WWE 2K17 video [TAKE-TWO_0000488.mp4]
127	WWE 2K17 video [TAKE-TWO_0000489.mp4]
128	WWE 2K16 video [TAKE-TWO_0000490.mp4]
129	WWE 2K18 video [TAKE-TWO_0000491.mp4]
130	WWE 2K17 video [TAKE-TWO_0000492.mp4]
131	WWE 2K18 video [TAKE-TWO_0000493.mp4]
132	WWE 2K18 video [TAKE-TWO_0000494.mp4]
133	WWE 2K18 video [TAKE-TWO_0000495.mp4]

Plt. Exh. No.	Description
134	WWE 2K18 video [TAKE-TWO_0000496.mp4]
135	360 video of Randy Orton character [TAKE-TWO_0000930.mp4]
136	360 video of Randy Orton character [WWE_Alexander0000111.mp4]
137	360 video of Randy Orton character [WWE_Alexander0000131.mp4]
138	360 video of Randy Orton character [WWE_Alexander0000134.mp4]
139	WWE 2K16 walk out video of Randy Orton character [WWE_Alexander0000139.mp4]
140	WWE 2K16 video [WWE_Alexander0000147.mp4]
141	WWE 2K16 video [WWE_Alexander0000150.mp4]
142	360 video of Randy Orton character [WWE_Alexander0000154.mp4]
143	360 video of Randy Orton character [WWE_Alexander0000161.mp4]
144	360 video of Randy Orton character [WWE_Alexander0000205.mp4]
145	360 video of Randy Orton character [WWE_Alexander0000206.mp4]
150	Video compilation of selected game play sessions from WWE 2K16. Plaintiff intends to introduce all or part of this video compilation and/or screenshots therefrom. [M. Little's Declaration, Doc 142-24, WWE2K16 Xbox Game]
151	Video compilation of selected game play sessions from WWE 2K17. Plaintiff intends to introduce all or part of this video compilation and/or screenshots therefrom. [M. Little's Declaration, Doc 142-25, WWE2K17 Xbox Game]
152	Video compilation of selected game play sessions from WWE 2K18. Plaintiff intends to introduce all or part of this video compilation and/or screenshots therefrom. [M. Little's Declaration, Doc 142-26, WWE2K18 Xbox Game]
153	Video compilation of selected game play sessions from WWE 2K16 (selections from Exhibit 150)
154	Video compilation of selected game play sessions from WWE 2K17 (selections from Exhibit 151)
155	Video compilation of selected game play sessions from WWE 2K18 (selections from Exhibit 152)

Defendants' Exhibits

Plaintiffs do not object to the admissibility of the following exhibits offered by

Defendant:

Def. Exh. No.	Description
4	Webpage for WWE 2K16, Standard Edition, available at https://2k.com/en-US/game/wwe-2k16-standard-edition/
5	WWE 2K16 Gameplay Image of Randy Orton (Bogost Rpt. at 28)
6	Video Recording of WWE 2K16 (Defendants' Summary Judgment Ex. 1, Appendix A)
7	WWE 2K16 Gameplay - Roman Reigns vs. Randy Orton
8	WWE 2K16 Gameplay - John Cena vs. Randy Orton
9	WWE 2K16 Gameplay - Royal Rumble
10	WWE 2K16 Gameplay - Randy Orton vs. John Cena
11	WWE 2K16 Gameplay - Seth Rollins vs. Stone Cold Steve Austin
12	Webpage for WWE 2K 17, Standard Edition, WWE 2K 17, available at https://2k.com/en-US/game/wwe-2k17-standard-edition/
13	Video Recording of WWE 2K17 (Defendants' Summary Judgment Ex. 1, Appendix B)
14	WWE 2K17 Gameplay - Randy Orton vs. Bubba Ray Dudley
15	WWE 2K17 Gameplay - Randy Orton vs. Kane
16	WWE 2K17 Gameplay - Royal Rumble
17	WWE 2K17 Gameplay - Randy Orton vs. John Cena
18	WWE 2K17 Gameplay - Roman Reigns vs. Brock Lesnar
19	Webpage for WWE 2K 18, Standard Edition, WWE 2K 18, available at https://2k.com/en-US/game/wwe-2k18-standard-edition/
20	WWE 2K18 Load Screen Image (Bogost Rpt. at 20)
21	WWE 2K18 Menu Options Image (Bogost Rpt. at 20)

Def. Exh. No.	Description
22	WWE 2K18 Play / One-on-One Options Image (Bogost Rpt. at 20)
23	WWE 2K18 Store / Purchasables Options Image (Bogost Rpt. at 20)
24	WWE 2K18 Gameplay Image of Randy Orton (Bogost Rpt. at 29)
25	Video Recording of WWE 2K18 (Defendants' Summary Judgment Ex. 1, Appendix C)
26	WWE 2K18 Gameplay - Randy Orton vs. Dean Ambrose
27	WWE 2K18 Gameplay - Roman Reigns vs. Randy Orton
28	WWE 2K18 Gameplay - Royal Rumble
29	WWE 2K18 Gameplay - Randy Orton vs. Seth Rollins
30	WWE 2K18 Gameplay - Brock Lesnar vs. Neville
32	Photo of Randy Orton, Bates stamped TAKE-TWO_0000913 (Confidential)
33	Photo of Randy Orton, Bates stamped TAKE-TWO_0000914 (Confidential)
34	Photo of Randy Orton, Bates stamped TAKE-TWO_0000918 (Confidential)
35	Photo of Randy Orton, Bates stamped TAKE-TWO_0000909 (Confidential)
36	Photo of Randy Orton, Bates stamped TAKE-TWO_0000910 (Confidential)
37	Photo of Randy Orton, Bates stamped TAKE-TWO_0000911 (Confidential)
38	Photo of Randy Orton, Bates stamped TAKE-TWO_0000912 (Confidential)
39	Photo of Randy Orton, Bates stamped TAKE-TWO_0000915 (Confidential)
40	Photo of Randy Orton, Bates stamped TAKE-TWO_0000916 (Confidential)
41	Photo of Randy Orton, Bates stamped TAKE-TWO_0000917 (Confidential)
42	Photo of Randy Orton, Bates stamped TAKE-TWO_0000919 (Confidential)
43	Photo of Randy Orton, Bates stamped TAKE-TWO_0000920 (Confidential)
44	Photo of Randy Orton, Bates stamped TAKE-TWO_0000921 (Confidential)
45	Photo of Randy Orton, Bates stamped TAKE-TWO_0000922 (Confidential)

Def. Exh. No.	Description
46	Photo of Randy Orton, Bates stamped TAKE-TWO_0000923 (Confidential)
47	Photo of Randy Orton, Bates stamped TAKE-TWO_0000924 (Confidential)
48	Photo of Randy Orton, Bates stamped TAKE-TWO_0000925 (Confidential)
49	Photo of Randy Orton, Bates stamped TAKE-TWO_0000926 (Confidential)
50	Photo of Randy Orton, Bates stamped TAKE-TWO_0000927 (Confidential)
51	Photo of Randy Orton, Bates stamped TAKE-TWO_0000928 (Confidential)
52	Photo of Randy Orton, Bates stamped TAKE-TWO_0000929 (Confidential)
60	Image of Texture Map File, Bates stamped TAKE-TWO_0000798 (Confidential)
61	Image of Texture Map File, Bates stamped TAKE-TWO_0000799 (Confidential)
62	Image of Texture Map File, Bates stamped TAKE-TWO_0000800 (Confidential)
63	Image of Texture Map File, Bates stamped TAKE-TWO_0000801 (Confidential)
64	Image of Texture Map File, Bates stamped TAKE-TWO_0000802 (Confidential)
65	Image of Texture Map File, Bates stamped TAKE-TWO_0000803 (Confidential)
66	Image of Texture Map File, Bates stamped TAKE-TWO_0000804 (Confidential)
67	Image of Texture Map File, Bates stamped TAKE-TWO_0000805 (Confidential)
68	Image of Texture Map File, Bates stamped TAKE-TWO_0000806 (Confidential)
69	Image of Texture Map File, Bates stamped TAKE-TWO_0000807 (Confidential)
70	Image of Texture Map File, Bates stamped TAKE-TWO_0000808 (Confidential)

Def. Exh. No.	Description
71	Image of Texture Map File, Bates stamped TAKE-TWO_0000809 (Confidential)
72	Image of Texture Map File, Bates stamped TAKE-TWO_0000810 (Confidential)
73	Image of Texture Map File, Bates stamped TAKE-TWO_0000811 (Confidential)
74	Image of Texture Map File, Bates stamped TAKE-TWO_0000812 (Confidential)
75	Image of Texture Map File, Bates stamped TAKE-TWO_0000813 (Confidential)
76	Image of Texture Map File, Bates stamped TAKE-TWO_0000814 (Confidential)
77	Image of Texture Map File, Bates stamped TAKE-TWO_0000815 (Confidential)
78	Image of Texture Map File, Bates stamped TAKE-TWO_0000816 (Confidential)
79	Image of Texture Map File, Bates stamped TAKE-TWO_0000817 (Confidential)
80	Image of Texture Map File, Bates stamped TAKE-TWO_0000818 (Confidential)
81	Image of Texture Map File, Bates stamped TAKE-TWO_0000819 (Confidential)
82	Image of Texture Map File, Bates stamped TAKE-TWO_0000820 (Confidential)
83	Image of Texture Map File, Bates stamped TAKE-TWO_0000821 (Confidential)
84	Image of Texture Map File, Bates stamped TAKE-TWO_0000822 (Confidential)
85	September 1, 2009 Booking Contract between World Wrestling Entertainment, Inc. and Randal Orton, Bates stamped WWE_Alexander0000001–WWE_Alexander0000026 (Confidential)

Def. Exh. No.	Description
87	Redacted February 11, 2013 Agreement between World Wrestling Entertainment, Inc. and Take-Two Interactive Software, Inc.
89	Redacted January 6, 2016 Amendment One to Agreement between World Wrestling Entertainment, Inc. and Take-Two Interactive Software, Inc.
91	Chart of WWE 2K Franchise sales since Apr 2015, Bates stamped TAKE-TWO_0001332 (Highly Confidential)
92	Chart of WWE 2K Franchise sales since Apr 2015, Bates stamped TAKE-TWO_0000983 (Highly Confidential)
93	Schedules of WWE 2K Sales and Profits (Malackowski Rpt. App. C) (Highly Confidential)
103	State of Missouri Patron Consent Form (Alexander Dep. Ex. 2)
136	Page titled "Randy Orton" on Smackdown Hotel (Bogost Rpt. Ex. 4)
137	January 16, 2017 Article titled "PC Monitor Display Sizes Continues to Grow" from TechTalk (Bogost Rpt. Ex. 5)
138	September 8, 2015 Article titled "TV Screens Are Getting Bigger and Bigger" from Statista (Bogost Rpt. Ex. 6)
146	Photo of WWE 2K Gameplay (Bogost Rpt. at 18)
147	Photo of WWE 2K Gameplay (Bogost Rpt. at 19)
148	Photo of WWE 2K Gameplay (Bogost Rpt. at 19)
149	Photo of WWE 2K Gameplay (Bogost Rpt. at 19)
150	Photo of WWE 2K Gameplay (Bogost Rpt. at 19)
151	Photo of WWE 2K Gameplay (Bogost Rpt. at 29)
152	Photo of WWE 2K Gameplay (Bogost Rpt. at 29)
153	Photo of WWE 2K Gameplay (Bogost Rpt. at 30)
164	Image of merchandise titled "WWE Bragging Rights 2009 PPV Promo Poster, Undertaker, CM Punk, Excellent Cond," available at https://www.ebay.com/itm/WWE-Bragging-Rights-2009-PPV-Promo-Poster-Undertaker-CM-Punk-Excellent-Cond/173570690472?hash=item28699e8da8:g:3~YAAOSwnVRbtbUc

Def. Exh. No.	Description
165	Image of merchandise titled “RANDY ORTON Med THE LEGEND Killer 2002 WWE Wwf WRESTLING Tee Shirt New Deadstock,” available at https://www.ebay.com/itm/RANDY-ORTON-Med-THE-LEGEND-Killer-2002-WWE-Wwf-WRESTLING-Tee-Shirt-New-Deadstock/353067731803?hash=item52347a0b5b:g:eaEAAOSw9~xerxug
166	Image of merchandise titled “2004 WWF UNFORGIVEN Promo T-SHIRT Triple H VS Randy Orton WWE Rare VTG RAW L,” available at https://www.ebay.com/itm/2004-WWF-UNFORGIVEN-Promo-T-SHIRT-Triple-H-VS-Randy-Orton-WWE-Rare-VTG-RAW-L/263906290659?hash=item3d720a6be3:g:arcAAOSwKWxbh0Hd
167	Image of merchandise titled “WWE Wrestling Armageddon 2007 PPV T-Shirt 3XL Black Randy Orton Undertaker Edge,” available at https://www.ebay.com/itm/WWE-Wrestling-Armageddon-2007-PPV-T-Shirt-3XL-Black-Randy-Orton-Undertaker-Edge/283836586487?hash=item4215fa99f7:g:OucAAOSw0NZehl45
168	Image of merchandise titled “2007 Royal Rumble Official Poster Rare!! 27x39 Blast Area PPV Poster WWF WWE,” available at https://www.ebay.com/itm/2007-Royal-Rumble-Official-Poster-Rare-27x39-Blast-Area-PPV-Poster-WWF-WWE/133371986052?hash=item1f0d970084:g:xEgAAOSwlmdfCaZ
169	Image of merchandise titled “WWE RANDY ORTON NO MERCY CARDBOARD POSTER (NEW),” available at https://www.ebay.com/itm/WWE-RANDY-ORTON-NO-MERCY-CARDBOARD-POSTER-NEW/154051309241?hash=item23de2c6eb9:g:pNoAAOSwlGZfPGCU
178	February 17, 2018 Instagram post from schrockbrian (Alexander Dep. Ex. 1)
179	Photo of Arm Tattoo with Drawing, produced as ALEXANDER000042 (Alexander Dep. Ex. 9)
182	Spreadsheet titled “WWE 2K Franchise sales since Apr’2015”, produced as TAKE-TWO_0000982 (Highly Confidential)
183	Spreadsheet titled “WWE 2K Franchise sales since Apr’2015”, produced as TAKE-TWO_0001447 (Highly Confidential)
186	Sportskeeda slide “#6 Randy Orton” from slideshow titled “Top 10 coolest WWE Tattoos” (Zagal Dep. Ex. 4)

Def. Exh. No.	Description
197	WWE SmackDown!: Shut Your Mouth (PS2, 2002) Gameplay - Randy Orton vs. Kane
198	WWE SmackDown!: Here Comes The Pain (PS2, 2003) Gameplay - Randy Orton vs. Batista
199	WWE SmackDown! vs. Raw (PS2, 2004) Gameplay - Randy Orton vs. Kane
200	WWE SmackDown! vs. Raw 2006 (PS2, 2005) Gameplay - Randy Orton vs. Triple H
201	WWE SmackDown vs. Raw 2007 (PS2, 2006) Gameplay - Randy Orton vs. Triple H
202	WWE SmackDown vs. Raw 2008 (PS2, 2007) Gameplay - Randy Orton vs. Kane
203	WWE SmackDown vs. Raw 2009 (PS2, 2008) Gameplay - Randy Orton vs. Undertaker
204	WWE SmackDown vs. Raw 2010 (PS2, 2009) Gameplay - Randy Orton vs. Kane
205	WWE SmackDown vs. Raw 2011 (PS2, 2010) Gameplay - Randy Orton vs. John Cena
206	Poster Advertising Pay-Per-View Event Titled WWE Vengeance
207	Poster Advertising Pay-Per-View Event Titled SmackDown Presents: No Way Out
208	Poster Advertising Pay-Per-View Event Titled WWE No Mercy
209	Poster Advertising Pay-Per-View Event Titled WWE Backlash
210	Poster Advertising Pay-Per-View Event Titled WWE Fatal 4 Way
211	Poster Advertising Pay-Per-View Event Titled Night of Champions
212	Poster Advertising Pay-Per-View Event Titled WWE Over the Limit
213	Poster Advertising Pay-Per-View Event Titled Payback
214	Poster Advertising Pay-Per-View Event Titled Payback

Def. Exh. No.	Description
215	Poster Advertising Pay-Per-View Event Titled The Greatest Wrestling Match Ever: BackLash
216	Screenshot from WWE SmackDown!: Shut Your Mouth (PS2, 2002) Gameplay - Randy Orton vs. Kane
217	Screenshot from WWE SmackDown!: Shut Your Mouth (PS2, 2002) Gameplay - Randy Orton vs. Kane
218	Screenshot from WWE SmackDown!: Shut Your Mouth (PS2, 2002) Gameplay - Randy Orton vs. Kane
219	Screenshot from WWE SmackDown!: Here Comes The Pain (PS2, 2003) Gameplay - Randy Orton vs. Batista
220	Screenshot from WWE SmackDown!: Here Comes The Pain (PS2, 2003) Gameplay - Randy Orton vs. Batista
221	Screenshot from WWE SmackDown!: Here Comes The Pain (PS2, 2003) Gameplay - Randy Orton vs. Batista
222	Screenshot from WWE SmackDown!: Here Comes The Pain (PS2, 2003) Gameplay - Randy Orton vs. Batista
223	Screenshot from WWE SmackDown! vs. Raw (PS2, 2004) Gameplay - Randy Orton vs. Kane
224	Screenshot from WWE SmackDown! vs. Raw (PS2, 2004) Gameplay - Randy Orton vs. Kane
225	Screenshot from WWE SmackDown! vs. Raw (PS2, 2004) Gameplay - Randy Orton vs. Kane
226	Screenshot from WWE SmackDown! vs. Raw (PS2, 2004) Gameplay - Randy Orton vs. Kane
227	Screenshot from WWE SmackDown! vs. Raw 2006 (PS2, 2005) Gameplay - Randy Orton vs. Triple H
228	Screenshot from WWE SmackDown! vs. Raw 2006 (PS2, 2005) Gameplay - Randy Orton vs. Triple H
229	Screenshot from WWE SmackDown! vs. Raw 2006 (PS2, 2005) Gameplay - Randy Orton vs. Triple H

Def. Exh. No.	Description
230	Screenshot from WWE SmackDown! vs. Raw 2006 (PS2, 2005) Gameplay - Randy Orton vs. Triple H
231	Screenshot from WWE SmackDown! vs. Raw 2006 (PS2, 2005) Gameplay - Randy Orton vs. Triple H
232	Screenshot from WWE SmackDown! vs. Raw 2006 (PS2, 2005) Gameplay - Randy Orton vs. Triple H
233	Screenshot from WWE SmackDown! vs. Raw 2006 (PS2, 2005) Gameplay - Randy Orton vs. Triple H
234	Screenshot from WWE SmackDown vs. Raw 2007 (PS2, 2006) Gameplay - Randy Orton vs. Triple H
235	Screenshot from WWE SmackDown vs. Raw 2007 (PS2, 2006) Gameplay - Randy Orton vs. Triple H
236	Screenshot from WWE SmackDown vs. Raw 2007 (PS2, 2006) Gameplay - Randy Orton vs. Triple H
237	Screenshot from WWE SmackDown vs. Raw 2007 (PS2, 2006) Gameplay - Randy Orton vs. Triple H
238	Screenshot from WWE SmackDown vs. Raw 2008 (PS2, 2007) Gameplay - Randy Orton vs. Kane
239	Screenshot from WWE SmackDown vs. Raw 2008 (PS2, 2007) Gameplay - Randy Orton vs. Kane
240	Screenshot from WWE SmackDown vs. Raw 2008 (PS2, 2007) Gameplay - Randy Orton vs. Kane
241	Screenshot from WWE SmackDown vs. Raw 2009 (PS2, 2008) Gameplay - Randy Orton vs. Undertaker
242	Screenshot from WWE SmackDown vs. Raw 2009 (PS2, 2008) Gameplay - Randy Orton vs. Undertaker
243	Screenshot from WWE SmackDown vs. Raw 2009 (PS2, 2008) Gameplay - Randy Orton vs. Undertaker
244	Screenshot from WWE SmackDown vs. Raw 2009 (PS2, 2008) Gameplay - Randy Orton vs. Undertaker

Def. Exh. No.	Description
245	Screenshot from WWE SmackDown vs. Raw 2010 (PS2, 2009) Gameplay - Randy Orton vs. Kane
246	Screenshot from WWE SmackDown vs. Raw 2010 (PS2, 2009) Gameplay - Randy Orton vs. Kane
247	Screenshot from WWE SmackDown vs. Raw 2010 (PS2, 2009) Gameplay - Randy Orton vs. Kane
248	Screenshot from WWE SmackDown vs. Raw 2010 (PS2, 2009) Gameplay - Randy Orton vs. Kane
249	Screenshot from WWE SmackDown vs. Raw 2010 (PS2, 2009) Gameplay - Randy Orton vs. Kane
250	Screenshot from WWE SmackDown vs. Raw 2010 (PS2, 2009) Gameplay - Randy Orton vs. Kane
251	Screenshot from WWE SmackDown vs. Raw 2011 (PS2, 2010) Gameplay - Randy Orton vs. John Cena
252	Screenshot from WWE SmackDown vs. Raw 2011 (PS2, 2010) Gameplay - Randy Orton vs. John Cena
253	Screenshot from WWE SmackDown vs. Raw 2011 (PS2, 2010) Gameplay - Randy Orton vs. John Cena
254	Screenshot from WWE SmackDown vs. Raw 2011 (PS2, 2010) Gameplay - Randy Orton vs. John Cena
255	Photograph of Randy Orton (2002, forearms, front view)
256	Photograph of Randy Orton (2002, biceps, arms crossed, front view)
257	Photograph of Randy Orton (2002, biceps, back view)
258	Photograph of Randy Orton (2002, left bicep, front view)
259	Photograph of Randy Orton (2003, biceps, shoulders, back view)
260	Photograph of Randy Orton (2003, right bicep, back and zoomed-in view)
261	Photograph of Randy Orton (2003, right shoulder, zoomed-in view)
262	Photograph of Randy Orton (2004, left bicep, left forearm, side view)

Def. Exh. No.	Description
263	Photograph of Randy Orton (2004, left bicep, partial right bicep, back view)
264	Photograph of Randy Orton (2005, left bicep, side view)
265	Photograph of Randy Orton (2005, forearms, hands in air, front view)
266	Photograph of Randy Orton (2005, forearms, hands in air, back view)
267	Photograph of Randy Orton (2006, right bicep, partial right forearm, partial back, side view)
268	Photograph of Randy Orton (2006, back, biceps, hands in air, back view)
269	Photograph of Randy Orton (2007, back, partial biceps, back view)
270	Photograph of Randy Orton (2007, right forearm, Samantha)
271	Photograph of Randy Orton (2008, sleeves, front view)
272	Photograph of Randy Orton (2008, sleeves, arms crossed, front view)
273	Photograph of Randy Orton (2008, right sleeve, back view)
274	Photograph of Randy Orton (2008, partial right sleeve, zoomed-in back view)
275	Photograph of Randy Orton (2008, partial right sleeve, zoomed-in back view)
276	Photograph of Randy Orton (2008, partial right sleeve, zoomed-in back view)
277	Photograph of Randy Orton (2008, partial right sleeve, zoomed-in front view)
278	Photograph of Randy Orton (2008, partial right sleeve, zoomed-in front view)
279	Photograph of Randy Orton (2008, partial right sleeve, zoomed-in side view)
280	Photograph of Randy Orton (2008, partial sleeve, Alanna)
281	Photograph of Randy Orton (2008, partial sleeve, Alanna)
282	Photograph of Randy Orton (2008, left partial sleeve)
283	Photograph of Randy Orton (2008, partial sleeve, dove)
284	Photograph of Randy Orton (2008, partial sleeve, dove)
285	Photograph of Randy Orton (2008, left partial sleeve, dove, back view)

Def. Exh. No.	Description
286	Photograph of Randy Orton (2008, sleeves, front view)
287	Photograph of Randy Orton (2008, right sleeve, side view)
288	Photograph of Randy Orton (2008, left sleeve, side view)
289	Photograph of Randy Orton (2008, sleeves, front view)
290	Photograph of Randy Orton (2009, left sleeve, front view)
291	Photograph of Randy Orton (2009, right sleeve, front view)
292	Photograph of Randy Orton (2009, sleeves, back view)
293	Photograph of Randy Orton (2010, sleeves, front view)
294	Photograph of Randy Orton (2010, left sleeve, side view)
295	Photograph of Randy Orton (2010, sleeves, arms crossed, side view)
296	Photograph of Randy Orton (2011, sleeves, front view)
297	Photograph of Randy Orton (2011, sleeves, back view)
298	Photograph of Randy Orton (2011, sleeves, arms crossed, front view)
299	Photograph of Randy Orton (2012, left sleeve, side view)
300	Photograph of Randy Orton (2012, sleeves, back view)
301	Photograph of Randy Orton (2012, right sleeve, side view)
302	Photograph of Randy Orton (2013, right sleeve, side view)
303	Photograph of Randy Orton (2013, sleeves, back view)
304	Photograph of Randy Orton (2013, left sleeve, side view)
305	Photograph of Randy Orton (2014, right sleeve, side view)
306	Photograph of Randy Orton (2014, sleeves, back view)
307	Photograph of Randy Orton (2014, left sleeve, side view)
308	Photograph of Randy Orton (2014, sleeves, front view)
309	Photograph of Randy Orton (2014, sleeves, front view)

Def. Exh. No.	Description
310	Photograph of Randy Orton (2014, sleeves, back view)
311	Photograph of Randy Orton (2014, sleeves, arms crossed, zoomed-in front view)
312	Photograph of Randy Orton (2015, sleeves, back view)
313	Photograph of Randy Orton (2015, sleeves, wingspan, 3/4 view)
314	Photograph of Randy Orton (2015, sleeves, front view)
315	Photograph of Randy Orton (2016, sleeves, back view)
316	Photograph of Randy Orton (2016, sleeves, front view, wearing sleeveless hoodie)
317	Photograph of Randy Orton (2016, left sleeve, 3/4 view, wearing sleeveless hoodie)
318	Photograph of Randy Orton (2016, right sleeve, 3/4 view, wearing sleeveless hoodie)
319	Photograph of Randy Orton (2016, sleeves, front view, wearing sleeveless hoodie)
320	Photograph of Randy Orton (2017, sleeves, front view)
321	Photograph of Randy Orton (2017, sleeves, 3/4 view)
322	Photograph of Randy Orton (2017, sleeves, 3/4 view)
323	Photograph of Randy Orton (2017, sleeves, back view)
324	Photograph of Randy Orton (2017, sleeves, back view)
325	Photograph of Randy Orton (2018, sleeves, front view)
326	Photograph of Randy Orton (2018, right sleeve, side view)
327	Photograph of Randy Orton (2018, sleeves, back view)
328	Photograph of Randy Orton (2018, left sleeve, side view)
329	Photograph of Randy Orton (2018, sleeves, 3/4 view)

IT IS SO STIPULATED.

/s/ Anthony G. Simon (with consent)

Anthony G. Simon, IL 6209056
Anthony R. Friedman, IL 6299795
The Simon Law Group, P.C.
800 Market Street, Suite 1700
St. Louis, Missouri 63101
Telephone: (314) 241-2929
Fax: (314) 241-2029
asimon@simonlawpc.com
baskew@simonlawpc.com
afriedman@simonlawpc.com

R. Seth Crompton
The Holland Law Firm
300 N. Tucker, Suite 801
St. Louis, Missouri 63101
Telephone: (314) 241-8111
Fax: (314) 241-5554
scrompton@allfela.com

Attorneys for Plaintiff Catherine Alexander

/s/ Dale M. Cendali

Dale M. Cendali (admitted *pro hac vice*)
Joshua L. Simmons (admitted *pro hac vice*)
Christopher T. Ilardi (admitted *pro hac vice*)
Miranda D. Means (admitted *pro hac vice*)
Kirkland & Ellis LLP
601 Lexington Avenue
New York, New York 10022
Telephone: (212) 446-4800
dale.cendali@kirkland.com
joshua.simmons@kirkland.com
chris.ilardi@kirkland.com
miranda.means@kirkland.com

Michael J. Nester (#02037211)
Donovan Rose Nester P.C.
15 North 1st Street, Suite A
Belleville, Illinois 62220
Telephone: (618) 212-6500
mnester@drnpc.com

*Attorneys for Defendants Take-Two
Interactive Software, Inc., 2K Games, Inc.,
2K Sports, Inc., and Visual Concepts
Entertainment*

/s/ Curt Krasik (with consent)

Jerry McDevitt (admitted *pro hac vice*)
Curtis Krasik (admitted *pro hac vice*)
K&L Gates LLP
210 Sixth Avenue
Pittsburgh, Pennsylvania 15222
Telephone: (412) 355-8608
jerry.mcdevitt@klgates.com
curtis.krasik@klgates.com

Michael J. Nester (#02037211)
Donovan Rose Nester P.C.
15 North 1st Street, Suite A
Belleville, Illinois 62220
Telephone: (618) 212-6500
mnester@drnpc.com
*Attorneys for World Wrestling
Entertainment, Inc.*

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS DIVISION**

CATHERINE ALEXANDER,

Plaintiff,

-vs-

TAKE-TWO INTERACTIVE SOFTWARE, INC.,
2K GAMES, INC.; 2K SPORTS, INC.; WORLD
WRESTLING ENTERTAINMENT, INC.;
VISUAL CONCEPTS ENTERTAINMENT;
YUKE'S CO., LTD.; AND YUKE'S LA, INC.,

Defendants.

Case No. 3:18-cv-966-SMY

CERTIFICATE OF SERVICE

I hereby certify that on September 26, 2022, I electronically filed the foregoing **Joint Stipulation Relating to Admissibility of Trial Exhibits** with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Anthony G. Simon
Benjamin R. Askew
Anthony R. Friedman
Carrie L. Roseman
R. Seth Crompton
Tracey Blasa
Jerry McDevitt
Curtis Krasik

asimon@simonlawpc.com
baskew@simonlawpc.com
afriedman@simonlawpc.com
croseman@simonlawpc.com
scrompton@allfela.com
tblasa@allfela.com
jerry.mcdevitt@klgates.com
curtis.krasik@klgates.com

/s/ Dale M. Cendali

Dale M. Cendali (admitted *pro hac vice*)
Kirkland & Ellis LLP
601 Lexington Avenue
New York, New York 10022
dale.cendali@kirkland.com

*Attorney for Defendants 2K Games, Inc., 2K
Sports, Inc., Take-Two Interactive Software, Inc.,
Visual Concepts Entertainment*